

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Jeffboat (A Division of American Commercial Marine Services Co.)
1030 East Market Street
Jeffersonville, Indiana 47130**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 019-6874-00006	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary shipbuilding and repair source.

Responsible Official: Danny Irby
Source Address: 1030 East Market Street, Jeffersonville, Indiana 47130
Mailing Address: P.O. Box 610, Jeffersonville, Indiana 47131
SIC Code: 3731 for Primary Operating Scenario
3441 and 3449 for Alternate Operating Scenario No. 2
County Location: Clark
County Status: Nonattainment for Ozone and Particulate Matter
Attainment for all other criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under Emission Offset Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) Two (2) shot blast units (EU1), known as the Pangborn (No. 1) and the Wheelabrator (No. 2), each equipped with baghouse dust collectors known as BH1 and BH2, with flow rates of 13,000 acfm and 12,000 acfm, respectively, capacity: sheet steel required for the manufacture of 300 marine vessels per year, each;
- (b) Two (2) spray booths (EU2) for the application of weld-through (shop) primer performing shipbuilding, known as Booths No. 1 and No. 2, each equipped with paint arrestor pads for air pollution control, known as PA1 and PA2, capacity: 300 marine vessels per year, each;
- (c) Outdoor spray operations (EU3) performing shipbuilding, consisting of conventional, airless and electrostatic paint spray application methods, as well as brush and roller applications. A portable enclosure/booth for overspray control is being tested under Alternative Operating Scenario No. 1, facility production capacity: 600 marine vessels per year;
- (d) Welding operations (EU4) for the construction of marine vessels from sheet steel, capacity: 600 marine vessels per year; and
- (e) Flame cutting operations (EU5) for the construction of marine vessels from sheet steel, capacity: 600 marine vessels per year.

- (f) Alternative Operating Scenario No. 2, Emission units EU2 and EU3 performing non-shipbuilding metal fabrication under 326 IAC 8-2-9, two (2) spray booths (EU2), known as Booths No. 1 and No. 2, each equipped with paint arrestor pads for air pollution control, and outdoor spray operations (EU3) consisting of conventional, airless and electrostatic paint spray application methods, as well as brush and roller applications. All equipment is the same as that used in the primary operating scenario. Capacity: 195,000 tons of steel painted per year (equivalent to tonnage of 600 marine vessels per year in primary operating scenario).

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have source specific applicable requirements.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 Permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);

SECTION B

GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
- (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);

- (5) Any insignificant activity that has been added without a permit revision; and
- (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

B.13 Emergency Provisions [326 IAC 2-7-16]

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
 - (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
 - (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
- (2) An emergency as defined in 326 IAC 2-7-1(12); or
- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

- (1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]

- (2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1 has been obtained;

- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]
 - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
 - (2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM, shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.9 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on February 7, 1980.
- (b) If the ERP is disapproved by IDEM, OAM., the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

- (d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (e) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

- (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
 - (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
 - (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
 - (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]**
- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented.

IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

- (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
- (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.17 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;

- (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (a) Two (2) shot blast units (EU1), known as the Pangborn (No. 1) and the Wheelabrator (No. 2), each equipped with baghouse dust collectors known as BH1 and BH2, with flow rates of 13,000 acfm and 12,000 acfm, respectively, capacity: sheet steel required for the manufacture of 300 marine vessels per year, each.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-1]

Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the shot blast units shall be limited to 0.03 grain per dry standard cubic foot.

Compliance Determination Requirements

D.1.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.3 Particulate Matter (PM)

The baghouse dust collectors (BH1 and BH2) for PM control shall be in operation at all times when the shot blast units are in operation and exhausting to the outside atmosphere.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.4 Reporting Requirements

Any deviations shall be reported in accordance with Condition B.16 and summarized in the annual certification submitted by April 15 of each year.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (b) Two (2) spray booths (EU2) for the application of weld-through (shop) primer **performing shipbuilding**, known as Booths No. 1 and No. 2, each equipped with paint arrestor pads for air pollution control, known as PA1 and PA2, capacity: 300 marine vessels per year, each.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-12-4]

- (a) Pursuant to 326 IAC 8-12-4 (Shipbuilding or ship repair operations; volatile organic compound emissions limiting requirements), during application of any weld-through (shop) preconstruction primer, VOC emissions shall be limited as follows:
- (1) During application of any weld-through (shop) preconstruction primer, VOC emissions shall be limited throughout the year as follows:
 - (A) Waterbased weld-through (shop) preconstruction primer shall be used.
 - (B) The VOC content of weld-through (shop) preconstruction primer, as applied, shall not exceed zero (0).
 - (C) No VOC containing cleaning material shall be used in the primer application facility.
 - (D) No VOC containing thinner shall be added to the weld-through (shop) preconstruction primer.
 - (2) If the owner or operator of a shipbuilding or ship repair facility determines that a waterbased weld-through (shop) preconstruction primer can no longer be used due to an operational, performance, or availability constraint associated with the water-based weld-through (shop) preconstruction primer, the source shall do the following:
 - (A) Notify the department within seven (7) days of discontinuing use of the waterbased weld-through (shop) preconstruction primer.
 - (B) Submit to the department for approval a plan for an alternative control within sixty (60) days of discontinuance. The alternative control shall consist of one (1) of the following:
 - (i) A waterbased weld-through (shop) preconstruction primer.
 - (ii) A control system with a minimum overall VOC emissions reduction efficiency of ninety-five percent (95%) that is subject to each of the following requirements:

- (AA) The operation, maintenance, and testing requirements of 326 IAC 8-7-9.
- (BB) The monitoring, record keeping, and reporting requirements of 326 IAC 8-7-10.
- (C) Install the alternative control within nine (9) months of approval by the department of the plan required in clause (B).
- (3) During the time between the date when the owner or operator of the shipbuilding or ship repair facility discontinues the use of the water-based preconstruction primer and the date when the alternative control is installed, the weld-through (shop) preconstruction primer used by the owner or operator of such shipbuilding or ship repair facility shall not exceed a VOC content of five and sixty-five hundredths (5.65) pounds per gallon or the VOC content for weld-through (shop) preconstruction primer prescribed by the U.S. EPA in 40 CFR 63, Subpart II, National Emission Standard for Shipbuilding and Ship Repair (surface coating), whichever is lower.

D.2.2 Particulate Matter (PM) [326 IAC 6-1]

Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the spray booths shall be limited to 0.03 grain per dry standard cubic foot.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.2.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limits specified in Condition D.2.1 and the particulate matter limit specified in Condition D.2.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.5 Volatile Organic Compounds (VOC)

- (a) Compliance with the VOC content and usage limitations contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-12-5, 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (b) The VOC content and usage limitations and work practices shall be in compliance with 40 CFR 63, Subpart II, National Emission Standard for Shipbuilding and Ship Repair (surface coating).

D.2.6 VOC Emissions

Compliance with Condition D.2.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent month.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.7 Particulate Matter (PM)

The paint arrestor pads for PM control (PA1 and PA2) shall be in operation at all times when the two (2) paint booths are in operation.

D.2.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the paint arrestor pads. To monitor the performance of the paint arrestor pads, weekly observations shall be made of the exhaust while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.9 Record Keeping Requirements

- (a) To document compliance with Condition D.2.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (b) The permittee shall maintain records of all dates and times when the facility is engaged in shipbuilding operations.
- (c) The permittee shall maintain all records necessary to show compliance with 40 CFR 63, Subpart II, National Emission Standard for Shipbuilding and Ship Repair (surface coating).
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.10 Reporting Requirements for Particulate Matter (326 IAC 6-1)

Any deviations shall be reported in accordance with Condition B.16 and summarized in the annual certification submitted by April 15 of each year.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (c) Outdoor spray operations (EU3) **performing shipbuilding**, consisting of conventional, airless and electrostatic paint spray application methods, as well as brush and roller applications. A portable enclosure/booth for overspray control is being tested under Alternative Operating Scenario No. 1, facility capacity: 600 marine vessels per year.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-12-4]

- (a) Pursuant to 326 IAC 8-12-4 (Shipbuilding or ship repair operations; volatile organic compound emissions limiting requirements), VOC emissions shall be limited throughout the year as follows:
- (1) Provisions applicable to specialty coatings are as follows:
 - (A) Special marking coatings shall not exceed a VOC content of four and eight-hundredths (4.08) pounds per gallon.
 - (B) Heat resistant and high-gloss coatings shall not exceed a VOC content of three and fifty-hundredths (3.50) pounds per gallon.
 - (C) High-temperature coatings shall not exceed a VOC content of four and seventeen-hundredths (4.17) pounds per gallon.
 - (D) Weld-through (shop) preconstruction primers shall comply with subdivisions (3) through (5).
 - (E) Any other specialty coating shall not exceed a VOC content of two and eighty-three hundredths (2.83) pounds per gallon.
 - (2) During application of any general use coating from May 1 through September 30, VOC emissions shall be limited as follows:
 - (A) The VOC content of any general use coating shall not exceed two and eighty-three hundredths (2.83) pounds per gallon, as applied.
 - (B) No thinner shall be added to any general use coating.
- (b) The source shall comply with the following work practice standards:
- (1) Cleaning accessories, such as, but not limited to, paper, cloth, and rags that have been used for cleaning surfaces and equipment and that contain cleaning materials shall be stored in normally closed gasket sealed containers.

- (2) VOC-containing solvents and coatings shall be stored in normally closed sealed containers prior to use. Spent VOC-containing solvents and coatings shall be stored in normally closed gasket sealed containers.
 - (3) Cleaning materials for cleaning spray equipment, including paint lines, shall not be used unless the equipment for collecting the cleaning materials and minimizing its evaporation to the atmosphere is used.
 - (4) All handling and transfer of VOC-containing materials to and from containers, tanks, vats, drums, and piping systems shall be conducted in a manner that minimizes drips and spills, and any drips and spills shall be cleaned up promptly.
 - (5) All containers, tanks, vats, drums, and piping systems shall be free of cracks, holes and other defects and must be closed unless materials are being added to or removed from them.
- (c) Volatile organic compound (VOC) content of all coatings shall meet the limits of Table 2 of 40 CFR 63, Subpart II.

D.3.2 Training Requirements [326 IAC 8-12-4]

- (a) Pursuant to 326 IAC 8-12-4, the owner or operator of the source shall comply with the following training requirements:
- (1) The owner or operator shall develop a written worker training program. The training program shall be included in the compliance plan required to be submitted to the department for review by section 7(b)(1) of 326 IAC 8-12.
 - (2) All workers, including contractors, shall have completed a training program if they engage in any of the activities listed in subdivision (3).
 - (3) The training program may include training provided by the manufacturer or supplier of coatings, cleaning materials, or the application equipment thereof, and shall include written procedures, hands-on demonstration, as appropriate, and certification by the trainer of the trainee's ability to perform the task, on the following activities:
 - (A) Identification of appropriate coatings or cleaning materials.
 - (B) Preparation of coatings or cleaning materials according to coating or cleaning material manufacturer, distributor, or owner or operator's recommendations.
 - (C) Application of coatings or cleaning materials, or organic solvents using techniques that minimize their usage.
 - (D) Procedures to clean spray guns to minimize evaporation of organic solvents to the atmosphere.
 - (E) Work practice standards established in subsection (b).

- (F) Procedures to gather, record, monitor, and report data in accordance with section 7 of 326 IAC 8-12.
- (4) Beginning in 1997, the owner or operator shall provide annual refresher training prior to May 1 to any worker performing one (1) or more of the activities listed in subdivision (3). Such training shall be appropriate to the job responsibilities of the worker.
- (5) Any worker may perform one (1) or more activities listed in subdivision (3), for not more than one hundred eighty (180) days, notwithstanding the requirement of subdivision (2), provided:
 - (A) such untrained worker works under the supervision of a worker who meets the training requirements of subdivision (2); and
 - (B) the owner or operator keeps records of:
 - (i) the date the worker was assigned to the activity;
 - (ii) the date the training was completed; and
 - (iii) the name of the worker providing the supervision.
- (6) The owner or operator shall keep records of the training program. The records shall consist of the following:
 - (A) The data training was completed.
 - (B) A list of workers by name and worker activities listed in subdivision (3) in which each worker has been trained.
 - (C) A statement signed by the person providing the training certifying that the worker completed training and is proficient in the activities listed in subdivision (3) in which the worker will be engaged.

D.3.3 Particulate Matter (PM) [326 IAC 6-1]

Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the outdoor spray operations shall be limited to 0.03 grain per dry standard cubic foot.

Compliance Determination Requirements

D.3.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limits specified in Condition D.3.1 and the particulate matter limit specified in Condition D.3.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.3.5 Volatile Organic Compounds (VOC)

- (a) Compliance with the VOC content and usage limitations contained in Condition D.3.1 shall be determined pursuant to 326 IAC 8-12-5, 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (b) The VOC content and usage limitations and work practices shall be in compliance with 40 CFR 63, Subpart II, National Emission Standard for Shipbuilding and Ship Repair (surface coating).

D.3.6 VOC Emissions

Compliance with Condition D.3.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent month.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.7 Record Keeping and Reporting Requirements for VOC (326 IAC 8-12-7)

- (a) The following records shall be maintained at the facility for a minimum of three (3) years:
 - (1) Certification of the annual training program.
 - (2) The following records for each working day of the surface coating operation:
 - (A) The following for each coating:
 - (i) Trade name, manufacturer, coating category consistent with the definitions in section 3 of 326 IAC 8-12, and applicable VOC content consistent with section 4 of 326 IAC 8-12.
 - (ii) VOC content as supplied.
 - (iii) Certification from the coating manufacturer, MSDS, or product data sheet for each coating used.
 - (iv) Volume of coating used.
 - (v) Thinner added, if any, including the following:
 - (AA) Description.
 - (BB) VOC content.
 - (CC) Volume added.
 - (B) The following for each solvent:
 - (i) Description.
 - (ii) Description of use, including the following:

- (AA) Thinning.
 - (BB) Cleanup.
 - (iii) VOC content.
 - (iv) Volume used for thinning.
 - (v) Volume used for cleanup.
- (3) Copy of the compliance plan required by subsection (b)(1).
- (4) Copy of the quarterly compliance report required by subsection (b)(2).
- (5) The permittee shall maintain records of all dates and times when the facility is engaged in shipbuilding operations.
- (b) Notification and reporting requirements are as follows:
 - (1) Each source subject to 326 IAC 8-12 shall submit to the department for review a compliance plan. The department may require revisions to the compliance plan. A source may revise its compliance plan upon notifying the department in writing that a change to the compliance plan is necessary because there has been a major change in its manufacturing practices. The compliance plan shall include and address the following:
 - (A) Compliance procedure and an application for using alternative demonstration procedure if the owner or operator of the shipbuilding and ship repair facility intends to use an alternative procedure to demonstrate compliance as specified in section 5 of 326 IAC 8-12.
 - (B) Training program as specified in section 4(c) of 326 IAC 8-12.
 - (C) Procedures to comply with record keeping, including data gathering requirements specified in subsection (a)(2).
 - (D) Procedures to comply with work practice standards of section 4(b) of 326 IAC 8-12.
 - (2) Within sixty (60) days after the end of each quarter, each source subject to 326 IAC 8-12 shall submit a quarterly compliance report. Reporting frequency may be changed to semiannually after May 1, 1997, if a source complying with the requirements of 326 IAC 8-12 requests such change in writing and the department determines that semiannual reporting is adequate to assure compliance with 326 IAC 8-12. The department shall examine the source's compliance records in considering such request. The quarterly report shall contain the following information:
 - (A) Compliance status as of the last day of the quarter for the following:
 - (i) Work practice standards.

- (ii) Training program.
 - (iii) Emission standards.
 - (iv) Compliance procedures.
 - (v) Provisions of the compliance plan.
 - (B) Date, duration, nature, and cause of each instance of noncompliance with the requirements listed in clause (A), and the corrective action taken.
 - (C) As explanation for each instance of noncompliance with the requirements listed in clause (A), including whether the noncompliance is exempt due to a state or federal provision. If there is a state or federal provision providing an exemption for the noncompliance, the basis of the exemption must be cited.
- (3) Jeffboat shall generate such forms as necessary to meet the reporting requirements of this section.
- (c) The permittee shall maintain all records necessary to show compliance with 40 CFR 63, Subpart II, National Emission Standard for Shipbuilding and Ship Repair (surface coating).

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- | |
|--|
| (d) Welding operations (EU4) for the construction of marine vessels from sheet steel, capacity: 600 marine vessels per year. |
|--|

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter (PM) [326 IAC 6-1]

Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the outdoor welding operations shall be limited to 0.03 grain per dry standard cubic foot.

Compliance Determination Requirements

D.4.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.3 Reporting Requirements

Any deviations shall be reported in accordance with Condition B.16 and summarized in the annual certification submitted by April 15 of each year.

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (e) Flame cutting operations (EU5) for the construction of marine vessels from sheet steel, capacity: 600 marine vessels per year.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Particulate Matter (PM) [326 IAC 6-1]

Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the flame cutting operations shall be limited to 0.03 grain per dry standard cubic foot.

Compliance Determination Requirements

D.5.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.5.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.3 Reporting Requirements

Any deviations shall be reported in accordance with Condition B.16 and summarized in the annual certification submitted by April 15 of each year.

SECTION D.6 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (f) Alternative Operating Scenario No. 2, Emission units UE2 and EU3 **performing non-shipbuilding metal fabrication**, two (2) spray booths (EU2), known as Booths No. 1 and No. 2, each equipped with paint arrestor pads for air pollution control, and outdoor spray operations (EU3) consisting of conventional, airless and electrostatic paint spray application methods, as well as brush and roller applications. All equipment is the same as that used in the primary operating scenario. Capacity: 195,000 tons of steel painted per year (equivalent to tonnage of 600 marine vessels per year in primary operating scenario).

Permit conditions for emission units EU1, EU4 and EU5 remain unaffected by Alternative Operating Scenario No. 2.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating), VOC emissions shall be limited as follows:

- (a) Clear coatings shall be limited to 4.3 lb VOC/gallon of coating less water
- (b) Forced warm-air dried coatings shall be limited to 3.5 lb VOC/gallon of coating less water
- (c) Extreme performance coatings shall be limited to 3.5 lb VOC/gallon of coating less water
- (d) All other coatings shall be limited to 3.0 lb VOC/gallon of coating less water

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Note that when the source is engaged in non-shipbuilding activities it is not subject to 326 IAC 8-12.

D.6.2 Particulate Matter (PM) [326 IAC 6-1]

Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the paint booths and outside spray operation shall be limited to 0.03 grain per dry standard cubic foot.

D.6.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the two (2) spray booths (EU2), known as Booths No. 1 and No. 2, and their control devices. A preventive maintenance plan is not required for outdoor spray operations (EU3).

Compliance Determination Requirements

D.6.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limits specified in Condition D.6.1 and the particulate matter limit specified in Condition D.6.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.6.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content limitations contained in Condition D.6.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.6.6 VOC Emissions

Compliance with Condition D.6.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent month.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.6.7 Particulate Matter (PM)

The paint arrestor pads for PM control (PA1 and PA2) shall be in operation at all times when the two (2) paint booths are in operation.

D.6.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the paint arrestor pads. To monitor the performance of the paint arrestor pads, weekly observations shall be made of the exhaust while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.6.9 Record Keeping Requirements

- (a) To document compliance with Condition D.6.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.6.1.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.

- (b) To document compliance with Condition D.6.8, the Permittee shall maintain a log of weekly exhaust observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) The permittee shall maintain records of all dates and times when the facilities are engaged in non-shipbuilding operations.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.6.10 Reporting Requirements for Particulate Matter, (326 IAC 6-1)

Any deviations shall be reported in accordance with Condition B.16 and summarized in the annual certification submitted by April 15 of each year.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Jeffboat (A Division of American Commercial Marine Services Co.)
Source Address: 1030 East Market Street, Jeffersonville, Indiana 47130
Mailing Address: Box 610, Jeffersonville, Indiana 47131
Part 70 Permit No.: T 019-6874-00006

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Jeffboat (A Division of American Commercial Marine Services Co.)
Source Address: 1030 East Market Street, Jeffersonville, Indiana 47130
Mailing Address: Box 610, Jeffersonville, Indiana 47131
Part 70 Permit No.: T 019-6874-00006

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of Each Deviation

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Jeffboat (A Division of American Commercial Marine Services Co.)
Source Address: 1030 East Market Street, Jeffersonville, Indiana 47130
Mailing Address: Box 610, Jeffersonville, Indiana 47131
Part 70 Permit No.: T 019-6874-00006

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2	
9 1.	This is an emergency as defined in 326 IAC 2-7-1(12)
C	The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
C	The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2.	This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
C	The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

**Indiana Department of Environmental Management
Office of Air Management**

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	Jeffboat (A Division of American Commercial Marine Services Co.)
Source Location:	1030 East Market Street, Jeffersonville, Indiana 47130
County:	Clark
SIC Code:	3731, Normal Operations 3441 and 3499 (Alternative Operating Scenario No. 2)
Operation Permit No.:	T 019-6874-00006
Permit Reviewer:	Patrick T. Brennan

The Office of Air Management (OAM) has reviewed a Part 70 Permit application from Jeffboat relating to the operation of a shipbuilding and repair source. The source has existed since 1860's, and has operated under the current ownership since 1939. Actual emissions used in the permitting calculations are based upon the production of 235 river barges in 1995. Potential emissions are based upon a historical maximum production rate of 600 barges per year, which occurred in 1979.

The applicant has proposed two (2) alternative operating scenarios. Under Alternative Operating Scenario No. 1 the applicant would install an overspray control device for the outdoor painting operations. Under Alternative Operating Scenario No. 2 the applicant would perform non-shipbuilding tasks at the site during periods when the shipbuilding business is slow. This work would primarily be fabricated structural metal production. Under Alternative Operating Scenario No. 2 the Federal NESHAP for shipbuilding and 326 IAC 8-12 would not apply, and these operations would be governed by 326 IAC 8-2-9.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) Two (2) shot blast units (EU1) known as the Panghorn (No. 1) and the Wheelabrator (No. 2), each equipped with baghouse dust collectors known as BH1 and BH2, with flow rates of 13,000 acfm and 12,000 acfm, respectively, capacity: sheet steel required for the manufacture of 300 barges per year, each;
- (b) Two (2) spray booths (EU2) for the application of weld-through (shop) primer, known as Booths No. 1 and No. 2, each equipped with paint arrestor pads for air pollution control, known as PA1 and PA2, capacity: 300 barges per year, each;
- (c) Outdoor spray operations (EU3) consisting of conventional, airless and electrostatic paint spray application methods, as well as brush and roller applications. The spray equipment is equipped with a paint basket to reduce overspray. A portable enclosure/booth for overspray control is being tested under Alternative Operating Scenario No. 1, capacity: 600 barges per year;
- (d) Welding operations (EU4) for the construction of barges from sheet steel, capacity: 600 barges per year;
- (e) Flame cutting operations (EU5) for the construction of barges from sheet steel, capacity: 600 barges per year, and

- (f) Alternative Operating Scenario No. 2, Emission units UE2 and EU3 performing non-shipbuilding metal fabrication under 326 IAC 8-2-9, two (2) spray booths (EU2), known as Booths No. 1 and No. 2, each equipped with paint arrestor pads for air pollution control, and outdoor spray operations (EU3) consisting of conventional, airless and electrostatic paint spray application methods, as well as brush and roller applications. The spray equipment is equipped with a paint basket to reduce overspray. All equipment is the same as that used in the primary operating scenario. Capacity: 195,000 tons of steel painted per year (equivalent to tonnage of 600 barges per year in primary operating scenario).

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Emission Units and Pollution Control Equipment Under Enhanced New Source Review (ENSR)

There are no new facilities to be reviewed under the ENSR process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.
- (b) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) British thermal units per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight.
- (c) Wood-fired combustion sources with heat input equal to or less than one million (1,000,000) British thermal units per hour and not burning wood refuse, treated wood or chemically contaminated wood.
- (d) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (e) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (f) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (g) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (h) Paved and unpaved roads and parking lots with public access.
- (i) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (j) One (1) sand sweeping station - sand blasting of steel before painting.

Existing Approvals

The source has been operating under the following approvals:

- (a) OP 10-04-93-0262, issued on April 19, 1990,
- (b) OP 10-04-93-0263, issued on April 19, 1990,
- (c) OP 10-04-93-0264, issued on April 19, 1990,
- (d) OP 10-04-93-0265, issued on April 19, 1990, and
- (e) OP 10-04-93-0266, issued on April 19, 1990.

Enforcement Issue

There are no Enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 Permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 Permit application for the purposes of this review was received on October 10, 1996. Additional information was received on September 19, 1997.

A notice of completeness letter was mailed to the source on October 29, 1996.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are summarized in Appendix A beginning on page 23 of this document.

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	Potential Emissions (tons/year)
PM	greater than 250
PM ₁₀	greater than 250
SO ₂	less than 100
VOC	greater than 250
CO	less than 100
NO _x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM₁₀, not PM, is the regulated pollutant in consideration.

HAPs	Potential Emissions (tons/year)
Ethyl benzene	less than 10
Ethylene Glycol	less than 10
Methyl isobutyl ketone	less than 10
Toluene	less than 10
Xylene	greater than 10
Formaldehyde	less than 10
Methanol	less than 10
Propylene Oxide	less than 10
Methyl ethyl ketone	greater than 10
Chromium Compounds	less than 10
Cobalt Compounds	less than 10
Glycol Ethers	greater than 10
Lead Compounds	less than 10
Manganese Compounds	less than 10
Nickel Compounds	less than 10
TOTAL	greater than 25

- (a) The potential emissions (as defined in the Indiana Rule) of fine particulate matter (PM₁₀) and volatile organic compounds (VOC) are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

- (b) The potential emissions (as defined in Indiana Rule) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in Indiana Rule) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects 1995 emissions data submitted by the applicant.

Pollutant	Actual Emissions (tons/year)
PM	119
PM ₁₀	119
SO ₂	0.025
VOC	108.9
CO	2.64
NO _x	3.61
Ethyl benzene	0.570
Ethylene Glycol	0.037
Methyl isobutyl ketone	0.078
Toluene	0.147
Xylene	12.1
Formaldehyde	0.070
Methanol	1.27
Propylene Oxide	0.004
Methyl ethyl ketone	27.4
Chromium Compounds	0.012
Cobalt Compounds	0.002
Glycol Ethers	3.53
Lead Compounds	0.003
Manganese Compounds	1.32
Nickel Compounds	0.020
Total HAPs	46.9

Limited Potential to Emit

The table below summarizes the total limited potential to emit of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Shot Blasting (EU1)	0.296	0.296	0.0	0.0	0.0	0.0	0.022
Spray Booths (EU2)	3.00	3.00	0.0	0.0	0.0	0.0	0.0
Outdoor Spray (EU3)	272	272	0.0	546	0.0	0.0	233
Welding (EU4)	68.3	68.3	0.0	0.0	0.0	0.0	3.08
Flame Cutting (EU5)	93.8	93.8	0.0	0.0	0.0	0.0	0.347
Insignificant Activities	2.10	2.10	0.058	4.87	6.75	9.22	0.0
Total Emissions	440	440	0.058	551	6.75	9.22	236

Potential emissions under the alternative operating scenario are unknown. However, because the tonnage of steel painted is equivalent to 600 barges per year, and the coatings used are expected to be similar, the emissions are assumed to be the same as under the primary operating scenario.

Attached Tables 1 to 7 summarize the permit conditions and requirements

County Attainment Status

The source is located in Clark County.

Pollutant	Status
TSP	Nonattainment
PM ₁₀	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Nonattainment
CO	Attainment
Lead	Attainment

Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Clark County has been designated as nonattainment for ozone.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 Permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (326 IAC 12) applicable to this source.
- (b) This shipbuilding and repair source is subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, (40 CFR 63, Subpart II, and 326 IAC 20-1-1).

Pursuant to 40 CFR 63, Subpart II, National Emission Standard for Shipbuilding and Ship Repair (surface coating) and 326 IAC 20-1-1, the surface coating operations are subject to the following conditions:

- (1) Volatile organic compound (VOC) content of all paints shall meet the limits of Table 2 to Subpart II 40 CFR Part 63.
- (2) The owner/operator of the source shall ensure that:
 - (A) All handling and transfer of VOHAP-containing materials to and from containers, tanks, vats, drums, and piping systems is conducted in a manner that minimizes spills.
 - (B) All containers, tanks, vats, drums, and piping systems are free of cracks, holes, and other defects and remain closed unless materials are being added to or removed from them.

State Rule Applicability - Entire Source

326 IAC 2-3 (Emission Offset)

The source was constructed in the 1860's, has operated under the current ownership since 1939, and has operated at the maximum capacity of 600 barges per year prior to August 7, 1977. Therefore the source has not undergone emission offset review.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year in Clark County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of thirty percent (30%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-1 (Nonattainment Area Particulate Limitations)

Because the source has potential particulate emissions greater than 100 tons per year and is located in Clark County, 326 IAC 6-1-2 (nonattainment area particulate limitations) is applicable. Pursuant to 326 IAC 6-1-2, particulate emissions from the two (2) shot blast units, the two (2) spray booths, the outdoor spray operations, the welding operations and the flame cutting operations shall be limited to 0.03 grains per dry standard cubic foot.

- (a) For the shotblast units (EU1), the 326 IAC 6-1 particulate matter limitation for each unit is calculated as:

$$\frac{5,000 \text{ ft}^3}{\text{min}} \times \frac{0.03 \text{ gr}}{\text{ft}^3} \times \frac{60 \text{ min}}{\text{hr}} \times \frac{1 \text{ lb}}{7,000 \text{ gr}} \times \frac{8,760 \text{ hr}}{\text{yr}} \times \frac{\text{ton}}{2,000 \text{ lb}} = 5.63 \text{ tons/yr PM}$$

326 IAC 6-1 grain loading limit: 0.03 gr/ft³

Baghouse air flow rate: 5,000 acfm

The controlled particulate matter emission rate of 0.148 TPY per unit complies with this rule.

- (b) For the spray booths (EU2), the 326 IAC 6-1 particulate matter limitation is calculated as:

$$\frac{13,000 \text{ ft}^3}{\text{min}} \times \frac{0.03 \text{ gr}}{\text{ft}^3} \times \frac{60 \text{ min}}{\text{hr}} \times \frac{1 \text{ lb}}{7,000 \text{ gr}} \times \frac{8,760 \text{ hr}}{\text{yr}} \times \frac{\text{ton}}{2,000 \text{ lb}} = 14.64 \text{ tons/yr PM}$$

326 IAC 6-1 grain loading limit: 0.03 gr/ft³

Spray booth air flow rate: 13,000 acfm

The controlled particulate matter emission rate of 1.50 TPY per spray booth complies with this rule.

- (c) The outdoor spray, flame cutting and welding operations all occur outdoors. Compliance with 326 IAC 6-1-2 for these operations shall be demonstrated through opacity and visual emissions observations and notations.
- (d) 326 IAC 6-1-17, (Nonattainment area particulate limitations: Clark County) is not applicable to Jeffboat.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

Under Alternative Operating Scenario No. 2, 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) may apply to the spray booths (EU2) and the outdoor spray operation (EU3). Pursuant to 326 IAC 8-2-9, the volatile organic compound (VOC) content of coating delivered to the applicator at these operations shall be limited to:

- (a) 4.3 pounds of VOCs per gallon of coating less water for clear coatings,
- (b) 3.5 pounds of VOCs per gallon of coating less water for air dried or forced warm air dried and extreme performance coatings, and
- (c) 3.0 pounds of VOCs per gallon of coating less water for all other coatings and coating applications systems.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

The source shall show compliance based upon MSDS, record keeping and calculations.

The alternative operating scenario will only be implemented if the shipbuilding business enters a downturn, and Jeffboat finds it necessary to contract other metal fabrication work. At the present time no non-shipbuilding work has been contracted.

326 IAC 8-12-4 (Shipbuilding or ship repair operations; volatile organic compound emissions limiting requirements)

- (a) The owner or operator of a shipbuilding or ship repair facility subject to this rule shall comply with the following VOC emissions limiting requirements:
 - (1) Provisions applicable to specialty coatings are as follows:
 - (A) Special marking coatings shall not exceed a VOC content of four and eight-hundredths (4.08) pounds per gallon.
 - (B) Heat resistant and high-gloss coatings shall not exceed a VOC content of three and fifty-hundredths (3.50) pounds per gallon.

- (C) High-temperature coatings shall not exceed a VOC content of four and seventeen-hundredths (4.17) pounds per gallon.
 - (D) Weld-through (shop) preconstruction primers shall comply with subdivisions (3) through (5).
 - (E) Any other specialty coating shall not exceed a VOC content of two and eighty-three hundredths (2.83) pounds per gallon.
- (2) During application of any general use coating from May 1 through September 30, VOC emissions shall be limited as follows:
- (A) The VOC content of any general use coating shall not exceed two and eighty-three hundredths (2.83) pounds per gallon, as applied.
 - (B) No thinner shall be added to any general use coating.
- (3) During application of any weld-through (shop) preconstruction primer, VOC emissions shall be limited throughout the year as follows:
- (A) Waterbased weld-through (shop) preconstruction primer shall be used.
 - (B) The VOC content of weld-through (shop) preconstruction primer, as applied, shall not exceed zero (0).
 - (C) No cleaning material shall be used in the primer application facility.
 - (D) No thinner shall be added to the weld-through (shop) preconstruction primer.
- (4) If the owner or operator of a shipbuilding or ship repair facility determines that a waterbased weld-through (shop) preconstruction primer can no longer be used due to an operational, performance, or availability constraint associated with the water-based weld-through (shop) preconstruction primer, the source shall do the following:
- (A) Notify the department within seven (7) days of discontinuing use of the waterbased weld-through (shop) preconstruction primer.
 - (B) Submit to the department for approval a plan for an alternative control within sixty (60) days of discontinuance. The alternative control shall consist of one (1) of the following:
 - (i) A waterbased weld-through (shop) preconstruction primer.
 - (ii) A control system with a minimum overall VOC emissions reduction efficiency of ninety-five percent (95%) that is subject to each of the following requirements:
 - (AA) The operation, maintenance, and testing requirements of 326 IAC 8-7-9.

- (BB) The monitoring, record keeping, and reporting requirements of 326 IAC 8-7-10.
- (C) Install the alternative control within nine (9) months of approval by the department of the plan required in clause (B).
- (5) During the time between the date when the owner or operator of the shipbuilding or ship repair facility discontinues the use of the water-based preconstruction primer and the date when the alternative control is installed, the weld-through (shop) preconstruction primer used by the owner or operator of such shipbuilding or ship repair facility shall not exceed a VOC content of five and sixty-five hundredths (5.65) pounds per gallon or the VOC content for weld-through (shop) preconstruction primer prescribed by the U.S. EPA in a final regulation establishing National Emissions Standards for Shipbuilding and Ship Repair (Surface Coating), whichever is lower.
- (b) A source subject to this rule shall comply with the following work practice standards:
 - (1) Cleaning accessories, such as, but not limited to, paper, cloth, and rags that have been used for cleaning surfaces and equipment and that contain cleaning materials shall be stored in normally closed gasket sealed containers.
 - (2) VOC-containing solvents and coatings shall be stored in normally closed sealed containers prior to use. Spent VOC-containing solvents and coatings shall be stored in normally closed gasket sealed containers.
 - (3) Cleaning materials for cleaning spray equipment, including paint lines, shall not be used unless the equipment for collecting the cleaning materials and minimizing its evaporation to the atmosphere is used.
 - (4) All handling and transfer of VOC-containing materials to and from containers, tanks, vats, drums, and piping systems shall be conducted in a manner that minimizes drips and spills, and any drips and spills shall be cleaned up promptly.
 - (5) All containers, tanks, vats, drums, and piping systems shall be free of cracks, holes and other defects and must be closed unless materials are being added to or removed from them.
- (c) The owner or operator of sources subject to this rule shall comply with the following training requirements:
 - (1) On or before January 1, 1996, the owner or operator shall develop a written worker training program. The training program shall be included in the compliance plan required to be submitted to the department for review by section 7(b)(1) of this rule.
 - (2) On or before May 1, 1996, all workers, including contractors, shall have completed a training program if they engage in any of the activities listed in subdivision (3).

- (3) The training program may include training provided by the manufacturer or supplier of coatings, cleaning materials, or the application equipment thereof, and shall include written procedures, hands-on demonstration, as appropriate, and certification by the trainer of the trainee's ability to perform the task, on the following activities:
 - (A) Identification of appropriate coatings or cleaning materials.
 - (B) Preparation of coatings or cleaning materials according to coating or cleaning material manufacturer, distributor, or owner or operator's recommendations.
 - (C) Application of coatings or cleaning materials, or organic solvents using techniques that minimize their usage.
 - (D) Procedures to clean spray guns to minimize evaporation of organic solvents to the atmosphere.
 - (E) Work practice standards established in subsection (b).
 - (F) Procedures to gather, record, monitor, and report data in accordance with section 7 of this rule.
- (4) Beginning in 1997, the owner or operator shall provide annual refresher training prior to May 1 to any worker performing one (1) or more of the activities listed in subdivision (3). Such training shall be appropriate to the job responsibilities of the worker.
- (5) Any worker may perform one (1) or more activities listed in subdivision (3), for not more than one hundred eighty (180) days, notwithstanding the requirement of subdivision (2), provided:
 - (A) such untrained worker works under the supervision of a worker who meets the training requirements of subdivision (2); and
 - (B) the owner or operator keeps records of:
 - (i) the date the worker was assigned to the activity;
 - (ii) the date the training was completed; and
 - (iii) the name of the worker providing the supervision.
- (6) The owner or operator shall keep records of the training program. The records shall consist of the following:
 - (A) The data training was completed.
 - (B) A list of workers by name and worker activities listed in subdivision (3) in which each worker has been trained.

- (C) A statement signed by the person providing the training certifying that the worker completed training and is proficient in the activities listed in subdivision (3) in which the worker will be engaged.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in permit Section D are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in permit Section D. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to particulate control systems at this source are as follows:

- (a) Daily visible emissions notations of the baghouse exhausts (BH1 and BH2) from the shot blasting units and from the paint arrestor exhausts (PA1 and PA2) from the spray booths shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

These monitoring conditions are necessary because these systems must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

- (b) The compliance requirements applicable to surface coating operations this source, pursuant to 326 IAC 8-12-5 (Shipbuilding or ship repair operations: compliance requirements) are as follows:

- (1) Compliance with the VOC emissions limiting requirements of section 4(a) of this rule shall be achieved on an as applied basis for each operating day for the following products:

- (A) Coatings.

- (B) Cleaning materials.
- (2) Compliance with the work practice standards of section 4(b) of this rule shall be achieved each operating day.
- (3) Compliance with the VOC emissions limiting requirements of section 4(a) of this rule shall be demonstrated using U.S. EPA Method 24. However, in lieu of testing each container of coating for VOC content, the alternative procedures that follow may be used:
 - (A) If a coating as supplied by the manufacturer is applied to the substrate, in lieu of testing each container of coating using U.S. EPA Method 24, a source subject to this rule may use the following alternative compliance procedure:
 - (i) Use a certificate issued by the manufacturer certifying the VOC content for each batch of coating.
 - (ii) Notify the coating applicators that they shall not add any thinner to the coatings.
 - (iii) Specify the procedure to be used to notify the coating applicators in the compliance plan required to be submitted in section 7(b)(1) of this rule.
 - (B) From May 1 through September 30, thinner may not be added to any general use coating. If a thinner is added to a coating before its application to the substrate, in lieu of testing the coating as applied using U.S. EPA Method 24, a source subject to this rule may use the following alternative compliance procedure:
 - (i) Use a certification from the coating manufacturer for each batch of that coating certifying its VOC content as supplied.
 - (ii) Record the volume of coating used.
 - (iii) Record the volume of thinner used.
 - (iv) Record the VOC content of thinner used.
 - (v) Type of coating.
- (4) In the compliance plan required to be submitted to the department by section 7(b)(1) of this rule, the source shall specify the compliance procedure or procedures allowed under subdivision (3) that it intends to use to demonstrate compliance with the VOC emissions limiting requirements of section 4(a) of this rule. If the source desires to use a compliance procedure other than one (1) of the three (3) described in subdivision (3), the source shall include in its compliance plan an application for approval by the department and the U.S. EPA of the proposed compliance procedure, subject to the following conditions:

- (A) The application shall include a demonstration that there is a definite and consistent relationship between U.S. EPA Method 24 results and the alternative procedure results.
- (B) The source shall ensure that the coatings it uses are supplied by coating manufacturers that use the procedures in "Procedures for Certifying Quantity of Volatile Organic Compounds Emitted by Paints, Ink, and Other Coatings" (revised June 1986), U.S. EPA 450/3-84-019 to certify the VOC content of coatings and thinners.
- (C) The source may use the alternative procedure during the time the application is being reviewed by the department and the U.S. EPA.
- (5) The department may test or have tested any coating for VOC content using U.S. EPA Method 24. If there is a discrepancy between the results of testing for VOC content, Method 24 test results shall take precedence.

These monitoring conditions are necessary to ensure compliance with 326 IAC 8-12-4 (Shipbuilding or ship repair operations; volatile organic compound emissions limiting requirements) and 326 IAC 2-7 (Part 70).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the Clean Air Act.
- (b) See attached calculations on pages 23 through 26 of this document for detailed air toxic calculations.

Conclusion

The operation of this shipbuilding and repair source shall be subject to the conditions of the attached proposed **Part 70 Permit No. T 019-6874-00006**.

Table 1

Description of facility: Two (2) shot blast units (EU1)
Max Rating: 300 barges per year, each
Construction Date: Unit 1 - 1980, Unit 2 - 1970
Control Device: Two (2) baghouse dust collectors
Stack/Vent ID: BH1, BH2

Facility class: 042

Description: Shot Blasting

EMISSION LIMITATIONS		
Numerical Emission Limit:	PM < 0.03 grains per dscf	
Regulation/Citation:	326 IAC 6-1	
Compliance Demonstration:		
PERFORMANCE TESTING		
	NA	
Parameter/Pollutant to be Tested:		
Testing Method/Analysis:		
Testing Frequency/Schedule:		
Submittal of Test Results:		
COMPLIANCE MONITORING		
Monitoring Description:	Opacity observations	
Monitoring Method:	Visible	
Monitoring Regulation/Citation:	326 IAC 5-1	
Monitoring Frequency:	Daily	
RECORD KEEPING		
Parameter/Pollutant to be Recorded:	Baghouse/PM ₁₀	
Recording Frequency:	As necessary	
REPORTING REQUIREMENTS		
	Upon request	
Information in Report:	Summary of Deviations	
Reporting Frequency/Submittal:	As necessary within 10 days of discovery of deviation	
Additional Comments:		

Table 2

Description of facility: Two (2) spray booths (EU2) for the application of weld-through (shop) primer
Max Rating: 300 barges per year, each
Construction Date: Unit 1 - 1980, Unit 2 - 1970
Control Device: Two (2) paint arrestor pads
Stack/Vent ID: PA1, PA2

Facility class: 025

Description: Surface Coating of Marine Vessels by Jeffboat

EMISSION LIMITATIONS		
Numerical Emission Limit:	VOC content of weld-through (shop) preconstruction primer, as applied, shall not exceed zero (0).	PM < 0.03 grains per dscf
Regulation/Citation:	326 IAC 8-12-4	326 IAC 6-1
Compliance Demonstration:		
PERFORMANCE TESTING NA		
Parameter/Pollutant to be Tested:		
Testing Method/Analysis:		
Testing Frequency/Schedule:		
Submittal of Test Results:		
COMPLIANCE MONITORING		
Monitoring Description:	Emissions Minimization	Opacity observations
Monitoring Method:	U.S. EPA Method 24 or equivalent	Visible
Monitoring Regulation/Citation:	326 IAC 8-12-5	326 IAC 5-1
Monitoring Frequency:	Daily	Daily
RECORD KEEPING		
Parameter/Pollutant to be Recorded:	VOC usage, HAPs usage	Paint arrestor pad/PM ₁₀
Recording Frequency:	Daily	As necessary
REPORTING REQUIREMENTS		
Information in Report:	Compliance status as of the last day of the quarter of: Work practice standards, Training program, Emission standards, Compliance procedures, Provisions of compliance plan. Summary of deviations	Summary of deviations
Reporting Frequency/Submittal:	Quarterly	As necessary within 10 days of discovery of deviation
Additional Comments:		

Table 3

Description of facility: Outdoor spray operations (EU3)
Max Rating: 600 barges per year
Construction Date: 1939
Control Device: Paint basket for overspray control
 Portable enclosure/booth for overspray control (Alternative Op. Scenario No. 1)
Stack/Vent ID: Fugitive (outdoors)

Facility class: 025

Description: Surface Coating of Marine Vessels by Jeffboat

EMISSION LIMITATIONS	
Numerical Emission Limit:	Special marking coatings shall not exceed a VOC content of four and eight-hundredths (4.08) pounds per gallon. Heat resistant and high-gloss coatings shall not exceed a VOC content of three and fifty-hundredths (3.50) pounds per gallon. High-temperature coatings shall not exceed a VOC content of four and seventeen-hundredths (4.17) pounds per gallon. Weld-through (shop) preconstruction primers shall comply with subdivisions (3) through (5) of 326 IAC 8-12-4. Any other specialty coating shall not exceed a VOC content of two and eighty-three hundredths (2.83) pounds per gallon.
Regulation/Citation:	326 IAC 8-12-4
Compliance Demonstration:	
PERFORMANCE TESTING	
NA	
Parameter/Pollutant to be Tested:	
Testing Method/Analysis:	
Testing Frequency/Schedule:	
Submittal of Test Results:	
COMPLIANCE MONITORING	
Monitoring Description:	Emissions Minimization
Monitoring Method:	U.S. EPA Method 24 or equivalent
Monitoring Regulation/Citation:	326 IAC 8-12-5
Monitoring Frequency:	Daily
RECORD KEEPING	
Parameter/Pollutant to be Recorded:	VOC usage, HAPs usage
Recording Frequency:	Daily
REPORTING REQUIREMENTS	
Information in Report:	Compliance status as of the last day of the quarter of: Work practice standards, training program, Emission standards, Compliance procedures, Provisions of compliance plan. Summary of deviations
Reporting Frequency/Submittal:	Quarterly
Additional Comments:	

Table 4

Description of facility: Outdoor spray operations (EU3)
Max Rating: 600 barges per year
Construction Date: 1939
Control Device: Paint basket for overspray control
 Portable enclosure/booth for overspray control (Alt. Op. Scenario No. 1)
Stack/Vent ID: Fugitive (outdoors)

Facility class: 025

Description: Surface Coating of Marine Vessels by Jeffboat

EMISSION LIMITATIONS		
Numerical Emission Limit:	PM < 0.03 grains per dscf	
Regulation/Citation:	326 IAC 6-1	
Compliance Demonstration:		
PERFORMANCE TESTING NA		
Parameter/Pollutant to be Tested:		
Testing Method/Analysis:		
Testing Frequency/Schedule:		
Submittal of Test Results:		
COMPLIANCE MONITORING NA (Fugitive)		
Monitoring Description:	Opacity observations	
Monitoring Method:	Visible	
Monitoring Regulation/Citation:	326 IAC 5-1	
Monitoring Frequency:	Daily	
RECORD KEEPING		
Parameter/Pollutant to be Recorded:	PM ₁₀	
Recording Frequency:	As necessary	
REPORTING REQUIREMENTS		
Information in Report:	Summary of deviations	
Reporting Frequency/Submittal:	As necessary within 10 days of discovery of deviation	
Additional Comments:		

Table 5

Description of facility: Welding Operations (EU4)
Max Rating: 600 barges per year
Construction Date: 1939
Control Device: None
Stack/Vent ID: Fugitive (outdoors)

Facility class: 031

Description: Metalworking

EMISSION LIMITATIONS		
Numerical Emission Limit:	PM < 0.03 grains per dscf	
Regulation/Citation:	326 IAC 6-1	
Compliance Demonstration:		
PERFORMANCE TESTING NA		
Parameter/Pollutant to be Tested:		
Testing Method/Analysis:		
Testing Frequency/Schedule:		
Submittal of Test Results:		
COMPLIANCE MONITORING		
Monitoring Description:	Opacity observations	
Monitoring Method:	Visible	
Monitoring Regulation/Citation:	326 IAC 5-1	
Monitoring Frequency:	Daily	
RECORD KEEPING		
Parameter/Pollutant to be Recorded:	PM ₁₀	
Recording Frequency:	As necessary	
REPORTING REQUIREMENTS		
Information in Report:	Summary of deviations	
Reporting Frequency/Submittal:	As necessary within 10 days of discovery of deviation	
Additional Comments:		

Table 6

Description of facility: Flame Cutting Operations (EU5)
Max Rating: 600 barges per year
Construction Date: 1939
Control Device: None
Stack/Vent ID: Fugitive (outdoors)

Facility class: 031

Description: Metalworking

EMISSION LIMITATIONS		
Numerical Emission Limit:	PM < 0.03 grains per dscf	
Regulation/Citation:	326 IAC 6-1	
Compliance Demonstration:		
PERFORMANCE TESTING NA		
Parameter/Pollutant to be Tested:		
Testing Method/Analysis:		
Testing Frequency/Schedule:		
Submittal of Test Results:		
COMPLIANCE MONITORING		
Monitoring Description:	Opacity observations	
Monitoring Method:	Visible	
Monitoring Regulation/Citation:	326 IAC 5-1	
Monitoring Frequency:	Daily	
RECORD KEEPING		
Parameter/Pollutant to be Recorded:	PM ₁₀	
Recording Frequency:	As necessary	
REPORTING REQUIREMENTS		
Information in Report:	Summary of deviations	
Reporting Frequency/Submittal:	As necessary within 10 days of discovery of deviation	
Additional Comments:		

Table 7

Description of facility: Alternative Operating Scenario No. 2, surface coating for non-shipbuilding metal fabrication at Spray Booths No. 1 and 2(EU2) and Outdoor Spray Operation (EU3)

Max Rating: NA

Construction Date: NA

Control Device (if any): Paint Arrestor Pads, EU1

Stack/Vent ID: PA1 and PA2 for EU2, EU3 is fugitive (outdoors)

Facility class: 020

Description: Surface Coating of Miscellaneous Metal

EMISSION LIMITATIONS		
Numerical Emission Limit:	Alternative Op Scenario No. 2 Clear Coatings: 4.3 lb VOC/gallon of coating Forced Warm-Air Dried Coatings: 3.5 lb VOC/gallon of coating Extreme perform. coatings: 3.5 lb VOC/gallon of coating All other coatings: 3.0 lb VOC/gallon of coating	PM < 0.03 grains per dscf
Regulation/Citation:	326 IAC 8-2-9	326 IAC 6-1
Compliance Demonstration:		
PERFORMANCE TESTING		
Parameter/Pollutant to be Tested:		
Testing Method/Analysis:		
Testing Frequency/Schedule:		
Submittal of Test Results:		
COMPLIANCE MONITORING		
Monitoring Description:	Emissions Minimization	Opacity observations (EU2 only)
Monitoring Method:	Spray Waste VOC into Containers	Visible
Monitoring Regulation/Citation:	326 IAC 8-2-9	326 IAC 5-1
Monitoring Frequency:	Monthly	Daily
RECORD KEEPING		
Parameter/Pollutant to be Recorded:	VOC usage, HAPs usage	PM ₁₀ Paint arrestor pads (EU2 only)
Recording Frequency:	Monthly	As necessary
REPORTING REQUIREMENTS		
Information in Report:		Summary of deviations
Reporting Frequency/Submittal:	As requested	As necessary within 10 days of discovery of deviation
Additional Comments:		

Appendix A

Summary of Applicant Submitted Emissions Calculations

The applicant has submitted a comprehensive set of emissions calculations which have been reviewed by OAM and found acceptable. These calculations are summarized below. The actual emissions represent data from calendar year 1995, and represent the production of 235 barges with one coat of paint in that year. Potential emissions represent a maximum shipyard production rate of 600 boats with two coats of paint.

Shotblasting

Jeffboat has two (2) shotblasting units, known as No. 1 and No. 2, used to prepare sheet steel for the application of weld-through (shop) primer. The manganese fraction of the PM emissions is estimated at 7.4% based upon the MSDS from the steel shot.

Shotblast No. 1 (Panghorn)

14.40 tons (28,800 pounds) of baghouse dust generated in 1995

The shipyard operated at a capacity of 235 barges per year

The baghouse is 99.6% efficient

$$\begin{aligned} 28,800 \text{ lb/yr} \times (600/235) &= 73,548 \text{ lb/yr collected dust adjusted for capacity} \\ 73,548 \text{ lb/yr} \div 0.996 &= 73,844 \text{ lb/yr uncontrolled potential PM emissions} \\ &= 36.92 \text{ TPY uncontrolled potential PM emissions} \\ 36.92 \text{ TPY} \times 0.076 &= 2.81 \text{ TPY uncontrolled potential PM emissions} \end{aligned}$$

$$\begin{aligned} 36.92 \text{ TPY} (1.0 - 0.996) &= 0.148 \text{ TPY potential PM emissions after controls} \\ 0.148 \times 0.076 &= 0.011 \text{ TPY potential PM emissions after controls} \end{aligned}$$

Shotblast No. 2 (Wheelabrator)

14.40 tons (28,800 pounds) of baghouse dust generated in 1995

The shipyard operated at a capacity of 235 barges per year

The baghouse is 99.6% efficient

$$\begin{aligned} 28,800 \text{ lb/yr} \times (600/235) &= 73,548 \text{ lb/yr collected dust adjusted for capacity} \\ 73,548 \text{ lb/yr} \div 0.996 &= 73,844 \text{ lb/yr uncontrolled potential PM emissions} \\ &= 36.92 \text{ TPY uncontrolled potential PM emissions} \\ 36.92 \text{ TPY} \times 0.076 &= 2.81 \text{ TPY uncontrolled potential PM emissions} \end{aligned}$$

$$\begin{aligned} 36.92 \text{ TPY} (1.0 - 0.996) &= 0.148 \text{ TPY potential PM emissions after controls} \\ 0.148 \times 0.076 &= 0.011 \text{ TPY potential PM emissions after controls} \end{aligned}$$

Actual PM and PM₁₀ emissions, based upon production of 235 barges in 1995, as well as potential PM and PM₁₀ emissions from the production of 600 barges, both before and after controls, are as follows:

	Uncontrolled PM (TPY)		Controlled PM (TPY)		Uncontrolled Mn (TPY)		Controlled Mn (TPY)	
	Actual	Potential	Actual	Potential	Actual	Potential	Actual	Potential
Shotblast No. 1	14.46	36.92	0.058	0.148	1.11	2.81	0.004	0.011
Shotblast No. 2	14.46	36.92	0.058	0.148	1.11	2.81	0.004	0.011
Total	28.92	73.84	0.116	0.296	2.20	5.62	0.009	0.022

Welding

During 1995, 3,165,450 pounds (1582.8 tons) of welding rod was used during the production of 235 barges. PM_{10} and HAPs emissions based upon this actual usage, as well as potential emissions from the maximum production rate of 600 barges per year, based upon AP-42 factors, are as follows:

HAP/Pollutant	Percent of average welding rod used	Actual emission in 1995 (TPY)	Potential emission (TPY)
Chromium Compounds	0.00032	0.005	0.012
Cobalt Compounds	0.0000632	0.001	0.003
Manganese Compounds	0.0756	1.20	3.06
Nickel Compounds	0.000126	0.002	0.005
PM_{10}	1.689	26.7	68.3

Flame Cutting

Emissions estimates from oxy-methane cutting are based upon emission factors taken from the American Welding Society (AWS) publication "Fumes and Gases in the Welding Environment" (1979) and actual oxygen usage. During 1995, 24,483,000 cubic ft of oxygen were used in the production of 235 barges. Based upon the AWS methodology, the applicant has developed an emission factor of 0.003 pounds of PM per cubic ft of oxygen. Concentrations of HAP in the fumes were determined to be Cr: 0.02%, PM: 0.30% and Ni: 0.05%.

Emissions based upon these factors from flame cutting during the production of 235 barges in 1995, as well as potential emissions from the maximum production rate of 600 barges per year are as follows:

HAP/Pollutant	Actual emissions in 1995 (TPY)	Potential emissions (TPY)
Chromium Compounds	0.007	0.019
Manganese Compounds	0.110	0.281
Nickel Compounds	0.018	0.047
PM ₁₀	36.7	93.8

Outdoor Painting Operations

The applicant used 63,233 gallons of paint in 1995, to produce 235 barges with one coat of paint. The average density of the paints used was 11.70 pounds per gallon, with a VOC content of 21.02% (2.46 lb VOC/gal). All paints used by the applicant are in compliance with 326 IAC 8-2-12, Shipbuilding or ship repair operations: volatile organic compound emission limiting requirements, and 40CFR Part 63, Subpart II, National Emission Standards for Shipbuilding and Ship Repair (Surface Coating). In 1997, the most commonly used paint (6,500 gal/month) has been Valspar Grey with a VOC content of 2.65 lbs/gal. Particulate emissions from overspray were estimated using a transfer efficiency of 85% when the paint baskets were in use (60% of total hours) and a transfer efficiency of 75% during other hours.

VOC, PM₁₀ and HAPs emissions from the production of 235 barges with one coat of paint in 1995 (63,233 gallons) and estimated potential emissions from the production of 600 barges with two coats of paint (322,887 gallons) are as follows:

HAP/Pollutant	Weight (%) HAP/Pollutant	Actual emissions in 1995 (TPY)	Potential emissions (TPY)
Ethyl benzene	0.146	0.540	2.76
Ethylene glycol	0.010	0.037	0.189
Methyl isobutyl ketone	0.021	0.078	0.397
Toluene	0.039	0.144	0.737
Xylene	3.22	11.9	60.8
Formaldehyde	0.019	0.070	0.359
Propylene oxide	0.001	0.004	0.019
Methyl ethyl ketone	0.091	0.337	1.72
Cobalt compounds	0.003	0.001	0.006
Glycol ethers	0.955	3.53	18.0
Lead compounds	0.0008	0.003	0.015
Total HAPs		16.2	85.0
Particulate Matter	24.25	53.2	272
Volatile Organic Compounds	21.02	77.8	397

Weld-Through (shop) Primer

Following shotblasting, the steel plates are coated with a two part weld-through (shop) through primer, in two indoor spray booths known as Spray Booth A and Spray Booth B. Part A of the primer is 30% potassium silicate, 70% solids and contains no VOCs. Part B is zinc dust.

During 1995, 22,398 gallons of Part A were used in the production of 117.5 barges in each booth. At 10.49 pounds per gallon and 30% solids, this accounted for 72,255 pounds of solids. Part B consisted of 398,210 pounds of zinc dust, for a combined total of 470,465 pounds of solids (235 tons) per booth. Assuming a 75% transfer efficiency and a 99% control efficiency from the dry filters, the controlled and uncontrolled PM emissions from actual production (235 barges in 1995) and potential production (600 barges) are as follows:

	1995 Actual PM (TPY)		Potential PM (TPY)	
	Uncontrolled	Controlled	Uncontrolled	Controlled
Paint Booth A	58.8	0.588	150	1.50
Paint Booth B	58.8	0.588	150	1.50
Total	118	1.18	300	3.00

Solvents

During 1995, 58,444 pounds of solvents were used, almost exclusively for cleanup, in the production of 235 barges. The solvent breakdown, as well as potential solvent emissions from the production of 600 barges are as follows:

HAP/Pollutant	Actual emissions in 1995 (TPY)	Potential emissions (TPY)
Ethyl benzene	0.030	0.202
Toluene	0.003	0.015
Xylene	0.172	0.877
Methanol	1.27	6.51
Methyl ethyl ketone	27.4	140
Total HAPS	28.9	148
VOCs	29.2	149

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: Jeffboat (A Division of American Commercial Marine Services Co.)
 Source Location: 1030 East Market Street, Jeffersonville, Indiana 47130
 County: Clark
 Part 70 Operating Permit: T 019-6874-00006
 SIC Code: 3731, Normal Operations
 3441 and 3499 (Alternative Operating Scenario No. 2)
 Permit Reviewer: Patrick T. Brennan

On December 11, 1997, the Office of Air Management (OAM) had a notice published in the Clark County Evening News, Jeffersonville, Indiana, stating that Jeffboat (A Division of American Commercial Marine Services Co.) had applied for a Part 70 Operating Permit to operate a shipbuilding and repair source, with dry filters as air pollution control. The notice also stated that OAM proposed to issue a Part 70 Operating Permit for this operation and provided information on how the public could review the proposed Part 70 Operating Permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Operating Permit should be issued as proposed.

Upon further review, the OAM has decided to make the following changes to the Part 70 Operating Permit. The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

1. Section A (Source Summary) has been changed as follows:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), ~~and presented in the permit application.~~ **The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.**

2. Condition A.1 (General Information) changes the description of a nonattainment area within an attainment county as follows.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

County Status: ~~Attainment for CO, PM₁₀, SO₂, NO_x and Lead~~
~~Nonattainment for Ozone~~
~~Nonattainment for Particulate Matter~~
Nonattainment area for Ozone and Particulate Matter
Attainment for all other criteria pollutants

3. Condition A.5 (Prior Permit Conditions Superseded) has been deleted. Language has been added to Condition B.14 (Permit Shield) to address the effect of prior permit conditions.

~~A.5 Prior Permit Conditions Superseded [326 IAC 2]~~

~~The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source, and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.~~

Section B

4. Condition B.1 (Permit No Defense) part (b) of the condition has been changed as follows:

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, **as set out in this permit in the Section B condition entitled "Permit Shield."**

5. Condition B.8 (Duty to Supplement and Provide Information) part (c) of the condition has been changed as follows:

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. **If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, For information claimed to be confidential, the Permittee must shall furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must shall furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.**

6. Condition B.11 (Annual Compliance Certification) part (c) has been changed to the following:

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually ~~certify that the source has complied~~ **submit a compliance certification report which addresses the status of the source's compliance** with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was **based on** continuous or intermittent **data**;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); ~~and~~
 - (5) **Any insignificant activity that has been added without a permit revision; and**
 - ~~(5)~~ (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The ~~notification which shall be submitted~~ **submittal** by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

7. Condition B.12 (Preventive Maintenance Plan) has been changed as follows:

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within **ninety (90) days** after issuance of this permit, including the following information on each **facility**:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing ~~emission units and associated~~ emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

**Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015**

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

8. Condition B.14 (Permit Shield) has been changed as follows:

B.14 Permit Shield [326 IAC 2-7-15]

-
- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
 - ~~(a)~~ **(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.** Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided ~~that either of the following:~~
 - (1) The applicable requirements are included and specifically identified in this permit;
or
 - (2) ~~IDEM, OAM, in acting on the Part 70 permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 permit includes the determination or a concise summary thereof. The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.~~
 - ~~(b)~~ **(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.**

~~(c)~~ **(d)** If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order. **No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.**

~~(d)~~ **(e)** Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
- (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
- (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
- (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

~~(e)~~ **(f)** This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

~~(f)~~ **(g)** This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]

~~(g)~~ **(h)** This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

9. Condition B.16 (Deviations from Permit Requirements and Conditions) has been changed as follows:

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
- (2) An emergency as defined in 326 IAC 2-7-1(12); or
- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

~~(b)~~ (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. **The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).**

~~(e)~~ (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

10. Condition B.18 (Permit Renewal) part (a) has been changed as follows:

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) **and 326 IAC 2-7-1(40).**

11. Conditions B.19 (Administrative Permit Amendment), B.20 (Minor Permit Modification), and B.21 (Significant Permit Modification) have all been combined into a new Condition B.19 (Permit Amendment or Modification) as follows. Conditions B.20 and B.21 have been deleted and the remainder of Section B has been renumbered. The new B.19 condition reads as follows:

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) **The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.**
- (b) **Any application requesting an amendment or modification of this permit shall be submitted to:**

**Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015**

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]**

12. Condition B.26 (now B.24) (Inspection and Entry) has removed "IDEM", since Local Agencies do not have IDEM identification cards. Also, part (e)(1) and (e)(2) have been added.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of ~~IDEM~~ **proper** identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
 - (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
 - (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
 - (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]
- (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]**
- (2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]**

13. Condition B.27 (now B.25) (Transfer of Ownership or Operation) part (b) has been changed as follows:

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. **The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

14. Condition B.28 (now B.26) (Annual Fee Payment) has been changed as follows:

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. ~~or in a time period consistent with the fee schedule established in 326 IAC 2-7-19.~~ **If the Permittee does not receive a bill from IDEM, OAM, the applicable fee is due April 1 of each year.**
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) ~~If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date,~~ The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. ~~The applicable fee is due April 1 of each year.~~

Section C

15. Condition C.1 (Major Source) has been removed.

~~C.1 Major Source~~

~~Pursuant to 326 IAC 2-3 (Emission Offset), this source is a major source.~~

16. Condition C.1 (Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour) has been added.

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

17. Condition C.2 (Opacity) has been updated to reflect current rule language. The condition has been changed to:

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (~~Visible Emissions~~ **Opacity** Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), ~~visible emissions opacity~~ **opacity** shall meet the following, unless otherwise stated in this permit:

- (a) ~~Visible emissions~~ **Opacity** shall not exceed an average of thirty percent (30%) ~~opacity~~ in ~~twenty-four (24) consecutive readings~~, any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) ~~Visible emissions~~ **Opacity** shall not exceed sixty percent (60%) ~~opacity~~ for more than a cumulative total of fifteen (15) minutes (sixty (60) readings **as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor**) in a six (6) hour period.

~~This condition is not federally enforceable.~~

18. Conditions C.3 through C.5 have been changed as follows:

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. ~~This condition is not federally enforceable.~~ **326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.**

C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. ~~This condition is not federally enforceable.~~

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). ~~Rule 326 IAC 6-4-2(4) regarding visible dust is not federally enforceable.~~ **326 IAC 6-4-2(4) is not federally enforceable.**

19. Condition C.6 (Operation of Equipment) has been changed as follows:

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit **and used to comply with an applicable requirement** shall be operated at all times that the emission units vented to the control equipment are in operation.

20. Condition C.7 (Asbestos Abatement Projects- Accreditation) and Condition C.12 (Asbestos Abatement Projects) have been combined into one condition as follows:

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) **Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.**

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:**
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or**
 - (2) If there is a change in the following:**
 - (A) Asbestos removal or demolition start date;**
 - (B) Removal or demolition contractor; or**
 - (C) Waste disposal site.**
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).**
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).**

All required notifications shall be submitted to:

**Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015**

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control**
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

21. Condition C.8 (Performance Testing) has had the rule cite changed to 326 IAC 3-6 and the following language has been added:

C.8 Performance Testing ~~[326 IAC 3-2-1]~~ **[326 IAC 3-6]**

- (a) All testing shall be performed according to the provisions of 326 IAC ~~3-2-1~~ **3-6** (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days ~~before~~ **prior to** the intended test date. **The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.**

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

22. Condition C.9 (Compliance Schedule) has been changed as follows:

C.9 Compliance Schedule ~~[326 IAC 2-7-6(3)]~~

The Permittee:

- (a) **Has certified that all facilities at this source are in compliance with all applicable requirements; and** ~~Will continue to comply with such requirements that become effective during the term of this permit; and~~
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) **Will comply with such applicable requirements that become effective during the term of this permit.** ~~Has certified that all facilities at this source are in compliance with all applicable requirements.~~

23. Condition C.10 (Compliance Monitoring) has been changed as follows:

C.10 Compliance Monitoring ~~[326 IAC 2-7-5(3)]~~ **[326 IAC 2-7-6(1)]**

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than **ninety (90) days** after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee **may extend compliance schedule an additional ninety (90) days provided the Permittee** ~~shall~~ notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, **prior to the end of the initial ninety (90) day compliance schedule** ~~no more than ninety (90) days after receipt of this permit~~, with full justification of the reasons for the inability to meet this date. ~~and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.~~

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

24. Condition C.11 (Monitoring Methods) has been changed as follows:

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the **applicable** requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

25. Condition C.12 (Asbestos Abatement Projects) has been deleted and has been incorporated into the revised Condition C.7 (Asbestos Abatement Projects). All subsequent Conditions have been renumbered accordingly.

~~**C.12 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]**~~

~~(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos-containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.~~

~~(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:~~

~~(1) When the amount of affected asbestos-containing material increases or decreases by at least twenty percent (20%); or~~

~~(2) If there is a change in the following:~~

~~(A) Asbestos removal or demolition start date;~~

~~(B) Removal or demolition contractor; or~~

~~(3) Waste disposal site.~~

~~(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).~~

~~(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).~~

~~All required notifications shall be submitted to:~~

~~Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015~~

~~(e) Procedures for Asbestos Emission Control~~

~~The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.~~

~~(f) Indiana Accredited Asbestos Inspector~~

~~The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.~~

26. Condition C.14 (now C.13) (Risk Management Plan) has been changed as follows:

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present **in a process** in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

- (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
- (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
- (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

27. Condition C.15 (now C.14) (Compliance Monitoring Plan - Failure to Take Response Steps) has had the following rule cites added:

C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5(3)][**326 IAC 2-7-6**]
[326 IAC 1-6]

28. Condition C.16 (now C.15) (Actions Related to Noncompliance Demonstrated by a Stack Test), has had the rule cites added to the title and following language added:

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test **[326 IAC 2-7-5]**
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

29. Condition C.17 (now C.16) (Emission Statement) part (a) has been changed as follows:

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)]
[326 IAC 2-6]

- (a) The Permittee shall submit an ~~certified~~ annual emission statement **certified pursuant to the requirements of 326 IAC 2-6**, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

30. Condition C.19 (now C.18) (General Record Keeping Requirements) has been changed as follows:

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)(B)][**326 IAC 2-7-6**]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location **for a minimum of three (3) years** and available **upon the request** ~~within one (1) hour upon verbal request~~ of an IDEM, OAM, representative. ~~for a minimum of three (3) years. They~~

The records may be stored elsewhere for the remaining two (2) years **as long as they are available upon request** ~~providing they are made available within thirty (30) days after written request.~~ **If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.**

31. Condition C.20 (now C.19) (General Reporting Requirements) has been changed as follows:

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

~~(a)~~ Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(a) **To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.**

(b) **The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:**

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

~~(b)~~ (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

~~(c)~~ (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.

~~(d)~~ (e) All instances of deviations **as described in Section B- Deviations from Permit Requirements Conditions** must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
- (2) An emergency as defined in 326 IAC 2-7-1(12); or
- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

- (e) (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (f) (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Section D

32. Section D (Facility Operation Conditions) has had the following language added to the facility description box in all Section Ds.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

33. Condition D.1.2 (Testing Requirements) has changed as follows:

D.1.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

~~Testing of this facility is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-7-6(1).~~

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

34. Condition D.2.4 (Testing Requirements) has been added to the permit. All subsequent Conditions have been renumbered accordingly.

D.2.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limits specified in Condition D.2.1 and the particulate matter limit specified in Condition D.2.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

35. Condition D.2.4 (now D.2.5) (Volatile Organic Compounds) has been changed to include reference to additional rule cites as well as 40 CFR 63, Subpart II, National Emission Standard for Shipbuilding and Ship Repair (surface coating).

D.2.5 Volatile Organic Compounds (VOC)

- (a) Compliance with the VOC content and usage limitations contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-12-5, **326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.**
- (b) **The VOC content and usage limitations and work practices shall be in compliance with 40 CFR 63, Subpart II, National Emission Standard for Shipbuilding and Ship Repair (surface coating).**

36. Condition D.2.6 (VOC Emissions) has been added to the permit. All subsequent Conditions have been renumbered accordingly.

D.2.6 VOC Emissions

Compliance with Condition D.2.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent month.

37. The daily filter checks are one of the very few examples of a direct check on the air pollution control equipment that is included in IDEM compliance monitoring provisions. The OAM believes that this is a very effective means of ensuring ongoing compliance. Additional monitoring of emissions is still useful to ensure that the filter is operating as designed; however, this can be done less frequently. OAM now requires weekly, rather than daily, visible observations and monthly, rather than weekly, overspray checks. Therefore, Condition D.2.6 (now D.2.8) has been revised as follows:

D.2.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the paint arrestor pads. To monitor the performance of the paint arrestor pads, ~~daily~~ **weekly** observations shall be made of the exhaust while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) ~~Weekly~~ **Monthly** inspections shall be performed of the coating emissions from the stack and the presence of overspray on the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

38. Condition D.2.7 (now D.2.9) (Record Keeping Requirements) has been changed to include reference to 40 CFR 63, Subpart II, National Emission Standard for Shipbuilding and Ship Repair (surface coating), and to reduce the frequency of overspray observations and inspections..

D.2.9 Record Keeping Requirements

- (a) To document compliance with Condition D.2.8, the Permittee shall maintain a log of ~~daily~~ **weekly** overspray observations, daily and ~~weekly~~ **monthly** inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (b) The permittee shall maintain records of all dates and times when the facility is engaged in shipbuilding operations.
- (c) **The permittee shall maintain all records necessary to show compliance with 40 CFR 63, Subpart II, National Emission Standard for Shipbuilding and Ship Repair (surface coating).**
- ~~(e)~~ (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.
39. Reference to 40 CFR 63, Subpart II, National Emission Standard for Shipbuilding and Ship Repair (surface coating) has been added to Condition D.3.1 (Volatile Organic Compounds).

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-12-4]

- (c) **Volatile organic compound (VOC) content of all coatings shall meet the limits of Table 2 of 40 CFR 63, Subpart II.**
40. Condition D.3.4 (Preventive Maintenance Plan) has been removed from the permit. See Applicants Comment 15.

~~**D.3.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**~~

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.~~

41. Condition D.3.4 (Testing Requirements) has been added to the permit.

D.3.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

- The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limits specified in Condition D.3.1 and the particulate matter limit specified in Condition D.3.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.**
42. Condition D.3.5 (Volatile Organic Compounds) has been changed to include reference to additional rule cites as well as 40 CFR 63, Subpart II, National Emission Standard for Shipbuilding and Ship Repair (surface coating).

D.3.5 Volatile Organic Compounds (VOC)

- (a) Compliance with the VOC content and usage limitations contained in Condition D.3.1 shall be determined pursuant to 326 IAC 8-12-5, **326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.**
- (b) **The VOC content and usage limitations and work practices shall be in compliance with 40 CFR 63, Subpart II, National Emission Standard for Shipbuilding and Ship Repair (surface coating).**

43. Condition D.3.6 (Visible Emission Notations) has been removed from the permit. See Applicants Comment 16.

~~**D.3.6 Visible Emissions Notations**~~

- ~~(a) Daily visible emission notations from the outdoor spray operations shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.~~
- ~~(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.~~
- ~~(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~
- ~~(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~
- ~~(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.~~

44. Condition D.3.6 (VOC Emissions) has been added to the permit.

D.3.6 VOC Emissions

Compliance with Condition D.3.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent month.

45. Conditions D.3.8 (Record Keeping Requirements for Particulate Matter) and D.3.9 (Reporting Requirements for Particulate Matter) have been removed from the permit. See Applicants Comments 18 and 19.

~~**D.3.8 Record Keeping Requirements for Particulate Matter, (326 IAC 6-1)**~~

- ~~(a) To document compliance with Condition D.3.6, the Permittee shall maintain records of daily visible emission notations of the outdoor spray operations.~~
- ~~(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~

~~D.3.9 Reporting Requirements for Particulate Matter, (326 IAC 6-1)~~

~~Any deviations shall be reported in accordance with Condition B.16 and summarized in the annual certification submitted by April 15 of each year.~~

46. Condition D.3.7 (Record Keeping and Reporting Requirements for VOC) has been changed to include reference to 40 CFR 63, Subpart II, National Emission Standard for Shipbuilding and Ship Repair (surface coating).

D.3.7 Record Keeping and Reporting Requirements for VOC (326 IAC 8-2-7)

(c) **The permittee shall maintain all records necessary to show compliance with 40 CFR 63, Subpart II, National Emission Standard for Shipbuilding and Ship Repair (surface coating).**

47. Condition D.4.2 (Testing Requirements) has changed as follows:

D.4.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

~~Testing of this facility is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-7-6(1).~~

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

48. Condition D.5.2 (Testing Requirements) has changed as follows:

D.5.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

~~Testing of this facility is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-7-6(1).~~

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.5.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

49. Condition D.6.3 (Preventive Maintenance Plan) has been revised to require a preventive maintenance plan for indoor painting operations only. See Applicants Comment 15.

D.6.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device **the two (2) spray booths (EU2) known as Booths No. 1 and No. 2, and their control devices. A preventive maintenance plan is not required for outdoor spray operations (EU3).**

50. Condition D.6.4 (Testing Requirements) has changed as follows:

D.6.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

~~Testing of this facility is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-7-6(1).~~

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limits specified in Condition D.6.1 and the particulate matter limit specified in Condition D.6.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

51. Condition D.6.5 (Volatile Organic Compounds) has had the rule cites changed.

D.6.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.6.1 shall be determined pursuant to ~~326 IAC 8-1-4(a)(3)(A)~~ **326 IAC 8-1-4(a)(3)** and ~~326 IAC 8-1-2(a)(7)~~ **326 IAC 8-1-2(a)** using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

52. Condition D.6.6 (VOC Emissions) has been added. All subsequent Conditions have been renumbered accordingly.

D.6.6 VOC Emissions

Compliance with Condition D.6.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent month.

53. Condition D.6.8 (Visible Emissions Notations) has been removed. See Applicants Comment 25.

~~**D.6.8 Visible Emissions Notations**~~

- ~~(a) Daily visible emission notations from the outdoor spray operations shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.~~
- ~~(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.~~
- ~~(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~
- ~~(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~
- ~~(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.~~

54. The daily filter checks are one of the very few examples of a direct check on the air pollution control equipment that is included in IDEM compliance monitoring provisions. The OAM believes that this is a very effective means of ensuring ongoing compliance. Additional monitoring of emissions is still useful to ensure that the filter is operating as designed; however, this can be done less frequently. OAM now requires weekly, rather than daily, visible observations and monthly, rather than weekly, overspray checks.

Therefore, Condition D.6.7 (now D.6.8) has been revised as follows:

D.6.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the paint arrestor pads. To monitor the performance of the paint arrestor pads, ~~daily~~ **weekly** observations shall be made of the exhaust while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) ~~Weekly~~ **Monthly** inspections shall be performed of the coating emissions from the stack and the presence of overspray on the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

55. In accordance with the changes made in Condition D.6.7 (now D.6.8) Part (b) of Condition D.6.9 has been revised as follows:

- (b) To document compliance with Condition D.6.8, the Permittee shall maintain a log of ~~daily~~ **weekly** exhaust observations, daily and ~~weekly~~ **monthly** inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

Forms

- 56. In the Certification Form, the words "Emergency/Deviation Occurrence Reporting Form" have been deleted as shown in form as follows.
- 57. The Quarterly Compliance Report is now called the Quarterly Compliance Monitoring Report, the column marked "No Deviations" has been deleted and the language has been changed as indicated in the following pages.
- 58. The Emergency/Deviation Occurrence Reporting Form has had the phrase "Attach a signed certification to complete this report" deleted from the bottom of the second page. The changes are shown in the following pages.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Jeffboat (A Division of American Commercial Marine Services Co.)
Source Address: 11030 East Market Street, Jeffersonville, Indiana 47130
Mailing Address: Box 610, Jeffersonville, Indiana 47131
Part 70 Permit No.: T 019-6874-00006

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

~~9 Emergency/Deviation Occurrence Reporting Form~~

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE REPORT**

Source Name: Jeffboat (A Division of American Commercial Marine Services Co.)
Source Address: 11030 East Market Street, Jeffersonville, Indiana 47130
Mailing Address: Box 610, Jeffersonville, Indiana 47131
Part 70 Permit No.: T 019-6874-00006

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the **compliance monitoring** requirements stated in this permit. This report shall be submitted quarterly (**or semi-annually**). Any deviation from the **compliance monitoring** requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify ~~zero in the column marked "No Deviations"~~ in the box marked **"No deviations occurred this reporting period"**.

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD. LIST EACH COMPLIANCE MONITORING REQUIREMENT EXISTING FOR THIS SOURCE:

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviations	No Deviations

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-6865

PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Jeffboat (A Division of American Commercial Marine Services Co.)
Source Address: 11030 East Market Street, Jeffersonville, Indiana 47130
Mailing Address: Box 610, Jeffersonville, Indiana 47131
Part 70 Permit No.: T 019-6874-00006

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2	
9 1.	This is an emergency as defined in 326 IAC 2-7-1(12)
C	The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
C	The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2.	This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
C	The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

~~Attach a signed certification to complete this report.~~

On January 9, 1998, James A. Bourque of Jeffboat, submitted comments on the proposed Part 70 Operating Permit. The comments are as follows:

Comment 1:

Throughout the permit, replace the word "barge(s)" with "marine vessels." Marine Vessels are not as restrictive a description as barges and better describes our actual product line.

Response 1:

This change has been made throughout the Part 70 permit. All reference to "barges" have been changed to "marine vessels".

Comment 2:

Pages 29, 30, 33, 39, 40 and 41 of 47. In the facility operations description block, the use of the small letters in parentheses is confusing, delete these letters.

Response 2:

The small letters in parenthesis are necessary to cross reference the individual facilities in Sections D.1 through D.6 with the facilities listed in the master equipment list in Section A.2 and on page 1 of the TSD. Therefore, these identification letters are not deleted.

Comment 3:

Page 6 of 47. SECTION A.1. Responsible official should be Danny Irby instead of James Bourque. James Bourque does not meet the requirements of a responsible official as defined in 326 IAC 2-7-1(33).

Response 3:

The permit has been revised to reflect this change.

Comment 4:

Page 6 of 47. SECTION A.1. Mailing address should say P.O. Box not just Box.

Response 4:

The permit has been revised to reflect this change.

Comment 5:

Page 6 of 47. SECTION A.1. The SIC codes, 3441 and 3449, associated with Alternate Operating Scenario (AOS) #2 where not listed.

Response 5:

The permit has been revised to reflect this change. Section A.1 as has been changed to address Comments 3 through 5 as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary shipbuilding and repair source.

Responsible Official: ~~James Bourque~~ **Danny Irby**
Source Address: 1030 East Market Street, Jeffersonville, Indiana 47130
Mailing Address: **P.O. Box 610, Jeffersonville, Indiana 47131**
SIC Code: **3731 for Primary Operating Scenario**
3441 and 3449 for Alternate Operating Scenario No. 2
County Location: Clark
County Status: ~~Attainment for CO, PM₁₀, SO₂, NO_x and Lead~~
~~Nonattainment for Ozone~~
~~Nonattainment for Particulate Matter~~
Nonattainment for Ozone and Particulate Matter
Attainment for all other criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under Emission Offset Rules;
Major Source, Section 112 of the Clean Air Act

Comment 6:

Page 6 of 47. SECTION A.2(c) & (f), Page 33 of 47. Section D.3(c), Page 41 of 47. SECTION D.6(f), Page 1 of 26, Permitted Emission Unit...(c), and Page 2 of 26, Permitted Emission Units... (f). Delete sentence, "The spray equipment is equipped with a paint basket to reduce overspray." The paint basket is a manlift used only when we are painting vertical surfaces on the vessels, and is not attached to the spray equipment. Our painting operations use all positions, not just vertical. The intended use of the portable enclosure/booth, used with Alternative Operating Scenario (AOS) #1, is to reduce the overspray when painting vertical surfaces by the addition of a filtered ventilation system providing a negative airflow around the spray equipment. The spray equipment will be used within this enclosure and the spray equipment is not attached to the enclosure/booth.

Response 6:

The permit has been revised to reflect this change. The equipment description for the outdoor spray equipment (EU3) now appears as follows in all of the above referenced places.

- (c) Outdoor spray operations (EU3) performing shipbuilding, consisting of conventional, airless and electrostatic paint spray application methods, as well as brush and roller applications. ~~The spray equipment is equipped with a paint basket to reduce overspray.~~ A portable enclosure/booth for overspray control is being tested under Alternative Operating Scenario No. 1, **facility** production capacity: 600 ~~barges~~ **marine vessels** per year;

Comment 7:

Page 7 of 47. SECTION A.3. The insignificant activities identified for the source are subject to certain general provisions of the State Implementation Plan, such as particulate rules. Suggest adding "source specific" before "applicable requirements."

Response 7:

The permit has been revised to reflect this change. The revised section is as follows:

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have **source specific** applicable requirements.

Comment 8:

Page 29 of 47. SECTION D.1(a). Change "Panghorn" to "Pangborn," and add the word "each" at the end of the paragraph.

Response 8:

The permit has been revised to reflect this change as follows:

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- a) Two (2) shot blast units (EU1), known as the ~~Panghorn~~ **Pangborn** (No. 1) and the Wheelabrator (No. 2), each equipped with baghouse dust collectors known as BH1 and BH2, with flow rates of 13,000 acfm and 12,000 acfm, respectively, capacity: sheet steel required for the manufacture of 300 ~~barges~~ **marine vessels** per year, **each**.

Section A.2 has also been revised to reflect this change.

Comment 9:

Page 30 of 47. SECTION D.2.1(a)(1)(C). Add the words "VOC containing" after the word "No." Clarification of the type of cleaning materials.

Response 9:

The permit has been revised to reflect this change. See response 10.

Comment 10:

Page 30 of 47. SECTION D.2.1(a)(1)(D). Add the words "VOC containing" after the word "No." Clarification of definition of thinner.

Response 10:

Section D.2.1 has been revised to reflect this change as follows:

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-12-4]

- (a) Pursuant to 326 IAC 8-12-4 (Shipbuilding or ship repair operations; volatile organic compound emissions limiting requirements), during application of any weld-through (shop) pre-construction primer, VOC emissions shall be limited as follows:

- (1) During application of any weld-through (shop) preconstruction primer, VOC emissions shall be limited throughout the year as follows:
 - (A) Waterbased weld-through (shop) preconstruction primer shall be used.
 - (B) The VOC content of weld-through (shop) preconstruction primer, as applied, shall not exceed zero (0).
 - (C) No **VOC containing** cleaning material shall be used in the primer application facility.
 - (D) No **VOC containing** thinner shall be added to the weld-through (shop) preconstruction primer.

Comment 11:

Page 31 of 47. SECTION D.2.6(a). Change second sentence to read, "To monitor the performance of the paint arrestor pads, daily observations shall be made of the exhaust while one or more of the booths are in operation". The emissions are monitored for overspray by observation of the exhaust from the paint booth, through the paint arrestor pads.

Response 11:

Section D.2.6 (a) (now 2.8(a)) has been revised to reflect this change as follows:

D.2.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the paint arrestor pads. To monitor the performance of the paint arrestor pads, ~~daily~~ **weekly** observations shall be made of the ~~overspray~~ **exhaust** while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Comment 12:

Page 31 of 47. SECTION D.2.6(b). Change first sentence to read, "Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the nearby ground." There is no access to the roofs and the stacks are near the edge of the buildings.

Response 12:

Section D.2.6(b) (now 2.8(b)) has been revised to reflect this change as follows:

D.2.6 Monitoring

- (b) ~~Weekly~~ **Monthly** inspections shall be performed of the coating emissions from the stack and the presence of overspray on ~~the rooftops and~~ the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Comment 13:

Page 32 of 47. SECTION D.2.7. Delete this section. This is excessive record keeping. Any deviations from the normal conditions will be reported as required by Condition B.16 and summarized in the annual certification submitted by April 15 of each year.

Response 13:

Record keeping is necessary to substantiate any deviations reported in the annual certification. In addition, condition D.2.7(b) (now 2.9(b)) is required to differentiate between the primary and alternative operating scenarios. Therefore, the record keeping requirement is not deleted.

Comment 14:

Page 33 of 47. SECTION D.3(c). Change last sentence to read, "A portable enclosure/booth for overspray control is being tested under Alternative Operation Scenario No. 1. Facility capacity: 600 marine vessels per year. Clarification of facility production capacity.

Response 14:

The permit has been revised to reflect this change as follows:

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (c) Outdoor spray operations (EU3) **performing shipbuilding**, consisting of conventional, airless and electrostatic paint spray application methods, as well as brush and roller applications. A portable enclosure/booth for overspray control is being tested under Alternative Operating Scenario No. 1, **facility** capacity: 600 ~~barges~~ **marine vessels** per year.

This change has also been made to the equipment list in Section A.2.

Comment 15:

Page 35 of 47. SECTION D.3.4. Preventive Maintenance Plan is not applicable for the Outdoor Spray Painting Operations since there is no control equipment. Delete this section.

Response 15:

Section D.3.4, Preventive Maintenance Plan, has been removed from the permit (see OAM change No. 40).

Comment 16:

Page 35 of 47. SECTION D.3.6. Since the Outdoor Spray Painting Operations are fugitive emissions, a visible emissions notation is not practical (fugitive emissions are nearly invisible). Delete this section. As noted in the TSD section, page 13 of 26, the compliance monitoring requirements applicable to the surface coating operations are in compliance with 326 IAC 8-12-5.

Response 16:

Proposed Section D.3.6, Visual Emissions Notations has been removed from the permit, as well as Section D.3.8(a), which required Record keeping of the Visual Emissions Notations. See IDEM Change No. 41.

Comment 17:

Page 38 of 47. SECTION D.3.7(b)(3). Change word "generale" to read "generate."

Response 17:

Section D.3.7(b)(3) (now D.3.8(b)(3)) has been changed as follows:

D.3.8 Record Keeping and Reporting Requirements for VOC (326 IAC 8-12-7)

(b) (3) Jeffboat shall ~~generale~~ **generate** such forms as necessary to meet the reporting requirements of this section.

Comment 18:

Page 38 of 47. SECTION D.3.8(a). Since the Outdoor Spray Operations are fugitive emissions, a visible emissions notation is not practicable. Delete this section.

Response 18:

Proposed Section D.3.8, Record Keeping Requirements for Particulate Matter, has been removed from the permit. See IDEM Change No. 42.

Comment 19:

Page 38 of 47. SECTION D.3.9. Since there is no control equipment associated with the Outdoor Spray Painting Operations, delete this section.

Response 19:

Proposed Section D.3.9, Reporting Requirements for Particulate Matter, has been removed from the permit. See IDEM Change No. 42.

Comment 20:

Page 41 of 47. SECTION D.6(f). Change "UE2" to read "EU2."

Response 20:

The permit has been revised to reflect this change.

Comment 21:

Page 41 of 47. SECTION D.6(f). Add sentence to read "Emission Units EU1, EU4, and EU5. Permit conditions remain unaffected by Alternative Operating Scenario No. 2" to the Facility Description.

Response 21:

The permit has been revised to reflect this change as follows:

Facility Description [326 IAC 2-7-5(15)]

- (f) Alternative Operating Scenario No. 2, Emission units ~~UE2~~ **EU2** and EU3 **performing non-shipbuilding metal fabrication**, two (2) spray booths (EU2), known as Booths No. 1 and No. 2, each equipped with paint arrestor pads for air pollution control, and outdoor spray operations (EU3) consisting of conventional, airless and electrostatic paint spray application methods, as well as brush and roller applications. All equipment is the same as that used in the primary operating scenario. Capacity: 195,000 tons of steel painted per year (equivalent to tonnage of 600 ~~barges~~ **marine vessels** per year in primary operating scenario).

Permit conditions for emission units EU1, EU4 and EU5 remain unaffected by Alternative Operating Scenario No. 2.

Comment 22:

Page 41 of 47. SECTION D.6.3. Change sentence to read, "A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the control devices associated with EU2." A Preventative Maintenance Plan is not applicable for the Outdoor Spray Painting Operations since there is no control equipment.

Response 22:

The requirement for a Preventative Maintenance Plan for outdoor spray operations has been removed. The revised Condition D.6.3 requires a Preventative Maintenance Plan only for indoor spray painting in Spray Booths No. 1 and No. 2. The revised condition is as follows:

D.6.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for ~~this facility and its control device~~ **the two (2) spray booths (EU2) known as Booths No. 1 and No. 2, and their control devices. A preventive maintenance plan is not required for outdoor spray operations (EU3).**

Comment 23:

Page 42 of 47. SECTION D.6.7(a). Change second sentence to read, "To monitor the performance of the paint arrestor pads, daily observations shall be made of the exhaust while one or more of the booths are in operation." The emissions are monitored for overspray by observation of the exhaust from the paint booths, through the paint arrestor pads.

Response 23:

Condition D.6.7(a) (now D.6.8(a)) has been changed as follows:

D.6.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the paint arrestor pads. To monitor the performance of the paint arrestor pads, ~~daily~~ **weekly** observations shall be made of the ~~overspray exhaust~~ while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Comment 24:

Page 42 of 47. SECTION D.6.7(b) Change first sentence to read, "Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the nearby ground." There is no access to the roofs and the stacks are near the edge of the buildings.

Response 24:

Condition D.6.7(b) (now D.6.8(b)) has been changed as follows:

D.6.8 Monitoring

- (b) ~~Weekly~~ **Monthly** inspections shall be performed of the coating emissions from the stack and the presence of overspray on ~~the rooftops and~~ the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Comment 25:

Page 42 of 47. SECTION D.6.8. Since the Outdoor Spray Painting Operations are fugitive emissions, a visible emissions notation is not practicable (fugitive emissions are nearly invisible). Delete this section. As noted in the TSD section, page 13 of 26, the compliance monitoring requirements applicable to the surface coating operations are in compliance with 326 IAC 8-12-5.

Response 25:

Proposed Section D.6.8, Visible Emissions Notations, has been removed from the permit. See IDEM Change No. 49.

Comment 26:

Page 43 of 47. SECTION D.6.9(b). In the first sentence, delete "and D.6.8" (visible emissions notation for outdoor spraying operations in section D.6.8) and change "overspray" to "exhaust."

Response 26:

Condition D.6.8 (Visible Emissions Notations) has been removed from the permit. Due to renumbering, Condition D.6.7 (Monitoring) is now Condition D.6.8. Section D.6.9(b) has been revised to reflect these changes as follows:

D.6.9 Record Keeping Requirements

- (b) To document compliance with Conditions ~~D.6.7 and 6.8~~ **6.8**, the Permittee shall maintain a log of ~~daily~~ **weekly overspray exhaust** observations, daily and ~~weekly~~ **monthly** inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

Comment 27:

Page 1 of 26 of the TSD. Source Background and Description. Second paragraph. Second sentence should read, "Under Alternative Operating Scenario No. 1 the applicant would install overspray control device(s) for certain components of the outdoor painting operations."

Response 27:

This paragraph has been revised as follows:

The applicant has proposed two (2) alternative operating scenarios. Under Alternative Operating Scenario No. 1 the applicant ~~would install an overspray control device for~~ **would install overspray control device(s) for certain components of** the outdoor painting operations. Under Alternative Operating Scenario No. 2 the applicant would perform non-shipbuilding tasks at the site during periods when the shipbuilding business is slow. This work would primarily be fabricated structural metal production. Under Alternative Operating Scenario No. 2 the Federal NESHAP for shipbuilding and 326 IAC 8-12 would not apply, and these operations would be governed by 326 IAC 8-2-9.

Comment 28:

Page 1 of 26 of the TSD. Permitted Emission Units . . . (c). Add a period after "No. 1" in the last sentence. Begin new last sentence with the word "Facility."

Response: 28:

This paragraph has been revised as follows:

- (c) Outdoor spray operations (EU3) consisting of conventional, airless and electrostatic paint spray application methods, as well as brush and roller applications. The spray equipment is equipped with a paint basket to reduce overspray. A portable enclosure/booth for overspray control is being tested under Alternative Operating Scenario No. 1. **Facility** capacity: 600 ~~barges~~ **marine vessels** per year;

Comment 29:

Page 4 of 26, Page 5 of 26, Page 23 of 26 and Page 24 of 26 of the TSD. The emissions of chromium, manganese, and nickel do not need to be included in the Title V Permit because the emission levels do not meet the criteria of 326 IAC 2-7-4(c)(3)(A). The source is not major for any of these pollutants and the emissions do not meet the definition of regulated pollutant as defined by 326 IAC 2-7-1(30).

Cobalt should be included since it is found in some paints that fall under Section 112 of the Clean Air Act and therefore meet the definition of regulated pollutant.

All specific references to chromium, manganese, and nickel pollutants can be deleted.

Response 29:

Chromium, manganese and nickel are listed as hazardous air pollutants (HAPs) under Section 112 of the Clean Air Act. A source is determined to be major for HAPs if emissions of a single HAP exceed 10 TPY, or if emissions of total HAPs exceed 25 TPY. Therefore, it is necessary to review emissions of all HAPs, whether the individual emissions exceed 10 TPY or not, to determine overall major source status. There are no references to these pollutants in the permit. However, they are referenced in the Technical Support Document, which serves as the technical basis for the determination that the source is major for HAPs. In addition, actual emissions of all HAPs are necessary for determination of Part 70 annual fees.

Comment 30:

Page 19 of 26, Table 4, Page 20 of 26, Table 5 and Page 21 of 26, Table 6 of the TSD. Compliance Monitoring Section. Delete all monitoring requirements as the emissions are fugitive.

Response 30:

There are no compliance monitoring requirements for these processes, EU3, EU4 and EU5 in the permit.

Comment 31:

Page 23 of 26 of the TSD. Replace reference to "PM" with "Mn" in rows 7 and 9 of Shotblast No. 1 (Pangborn) and rows 7 and 9 of Shotblast No. 2 (Wheelabrator).

Response 31:

The document has been corrected to reflect this change. See Response 32.

Comment 32:

Page 23 of 26 of the TSD. The emission factor for manganese is not consistent (7.4% or 7.6%). However, it should be 1.3%, with the steel shot usage of 334,800 pounds in 1995. Calculations should be redone with these new numbers.

Response 32:

The magnesium emissions from shotblasting have been revised as follows:

Jeffboat has two (2) shotblasting units, known as No. 1 and No. 2, used to prepare sheet steel for the application of weld-through (shop) primer. The manganese fraction of the PM emissions is estimated at 1.3% based upon MSDS of the steel shot.

Shotblast No. 1 (Pangborn)

14.40 tons (28,800 pounds) of baghouse dust generated in 1995
The shipyard operated at a capacity of 235 barges per year

The baghouse is 99.6% efficient

$$\begin{aligned}
 28,800 \text{ lb/yr} \times (600/235) &= 73,548 \text{ lb/yr collected dust adjusted for capacity} \\
 73,548 \text{ lb/yr} \div 0.996 &= 73,844 \text{ lb/yr uncontrolled potential PM emissions} \\
 &= 36.92 \text{ TPY uncontrolled potential PM emissions} \\
 36.92 \text{ TPY} \times 0.013 &= 0.480 \text{ TPY uncontrolled potential Mn emissions}
 \end{aligned}$$

$$\begin{aligned}
 36.92 \text{ TPY} (1.0 - 0.996) &= 0.148 \text{ TPY potential PM emissions after controls} \\
 0.148 \times 0.013 &= 0.002 \text{ TPY potential Mn emissions after controls}
 \end{aligned}$$

Shotblast No. 2 (Wheelabrator)

14.40 tons (28,800 pounds) of baghouse dust generated in 1995
 The shipyard operated at a capacity of 235 barges per year
 The baghouse is 99.6% efficient

$$\begin{aligned}
 28,800 \text{ lb/yr} \times (600/235) &= 73,548 \text{ lb/yr collected dust adjusted for capacity} \\
 73,548 \text{ lb/yr} \div 0.996 &= 73,844 \text{ lb/yr uncontrolled potential PM emissions} \\
 &= 36.92 \text{ TPY uncontrolled potential PM emissions} \\
 36.92 \text{ TPY} \times 0.013 &= 0.480 \text{ TPY uncontrolled potential Mn emissions}
 \end{aligned}$$

$$\begin{aligned}
 36.92 \text{ TPY} (1.0 - 0.996) &= 0.148 \text{ TPY potential PM emissions after controls} \\
 0.148 \times 0.013 &= 0.002 \text{ TPY potential Mn emissions after controls}
 \end{aligned}$$

Actual PM and PM₁₀ emissions, based upon production of 235 barges in 1995, as well as potential PM and PM₁₀ emissions from the production of 600 barges, both before and after controls, are as follows:

	Uncontrolled PM (TPY)		Controlled PM (TPY)		Uncontrolled Mn (TPY)		Controlled Mn (TPY)	
	Actual	Potential	Actual	Potential	Actual	Potential	Actual	Potential
Shotblast No. 1	14.46	36.92	0.058	0.148	0.188	0.480	0.001	0.002
Shotblast No. 2	14.46	36.92	0.058	0.148	0.188	0.480	0.001	0.002
Total	28.92	73.84	0.116	0.296	0.376	0.960	0.002	0.004